UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 6, 2014

VIA FEDERAL EXPRESS

Mr. Steven Loye
CEO
Senior Operations LLC, Senior Aerospace SSP Division
2980 N. San Fernando Blvd.
Burbank, California 91504

Re: 104 (e) Request for Information - San Fernando Valley Area 2 Superfund Site
Real Property located at 2980 N. San Fernando Rd., Burbank, CA.

Dear Mr. Loye:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release or threatened release of hazardous substances into the soil and groundwater at the San Fernando Valley Area 2 Superfund Site ("Site"), Glendale Chromium Operable Unit. As part of its investigation, EPA is seeking to determine the nature and extent of contamination at the Site, to assess the effects of contamination on the environment and public health, and to identify activities and parties that have or may have contributed to contamination at the Site.

EPA believes that you may have information about the property identified as 2980 N. San Fernando Rd., Burbank, CA, which may assist EPA in its investigation of the Site. Evidence from groundwater investigations to date suggests operations at various facilities in the area may have contributed to groundwater contamination through the use of chromium, chromium-containing compounds and volatile organic compounds (VOCs). Answers to the questions in Attachments B, C, D and E will provide us some of the information we need for this Site investigation. **Please answer all questions in Attachment B, and respond to questions in Attachments C, D and E as appropriate based on operations at 2980 N. San Fernando Rd., Burbank, CA.**

We request that you provide a complete and truthful response to this Information Request and attached questions within thirty (30) calendar days of your receipt of this letter. Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information gathering authority that allows EPA to require persons to furnish information or documents relating to:

(a) The identification, nature, and quantity of materials that have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
(b) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
(c) The ability of a person to pay for or perform a cleanup.

Please note that your compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to $37,500 per day of noncompliance. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Attachment A, including the requirement for supporting your claim for confidentiality.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§1320.4 and 1320.6(a).

Instructions on how to respond to the questions are described in Attachment A. Please return your written response to this request for information, signed by a duly authorized official of your company, within **thirty (30) calendar days** of receipt of this letter. Please direct your response to:

Andrew Taylor
Case Developer
United States Environmental Protection Agency
75 Hawthorne Street, SFD-7-5
8th Floor Mail Stop
San Francisco, California 94105

Your response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this matter on behalf of your company.

If you have questions regarding this Information Request, please contact Andrew Taylor at (415) 972-3814, or by email at Taylor.Andrew@epa.gov. If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Lisa Hanusiak at (415) 972-3152, or by email at Hanusiak.Lisa@epa.gov. Please direct any legal questions to Thomas Butler at (415) 972-3869, or by email at Butler.Thomas@epa.gov.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

Kathi Moore

Kathi Moore, Manager
Case Development/Cost Recovery Section
Site Cleanup Branch
Superfund Division

Enclosures (6):

Attachment A (Instructions and Definitions)
Attachment B (Information Request)
Attachment C (Information Request for Metal Finishers)
Attachment D (Information Request for Facilities That Have Utilized Cooling Systems)
Attachment E (Information Request for Facilities That Handled Volatile Organic Compounds)
Attachment F (Documents Evidencing Existence of Concrete Tanks and Clarifiers at the Facility)

cc:

Larry Moore
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Tedd Yargeau
California Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, CA 91311

Mark Rollins
Senior plc
59/61 High Street, Rickmansworth
Hertfordshire, United Kingdom WD3 1RH

ATTACHMENT A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Each Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained. **Please answer all questions in Attachments B, C, D and E as appropriate based on operations at 2980 N. San Fernando Rd., Burbank, CA.**

2. Number Each Answer. When answering the questions in Attachment B, C, D and E, please precede each answer with the corresponding number of the question and subpart to which it responds.

3. Number Each Document. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.

4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.

5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.

6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.

7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.

8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

a. clearly identify the portions of the information alleged to be entitled to confidential treatment;

b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);

c. measures taken by you to guard against the undesired disclosure of the information to others;

d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;

e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and

f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

9. Disclosure to EPA's Authorized Representatives. Information that you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even, in the case of some representatives, if you assert that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

United States Department of Justice

Department of Toxic Substances Control
California Environmental Protection Agency

Regional Water Quality Control Board
California Environmental Protection Agency

Toeroek Associates, Inc.
EPA Contract Number EP-BPA-11-W-001

CH2M Hill, Inc.
EPA RAC Contract Number EP-S9-08-04

E2 Consulting Engineers (subcontractor under CH2MHill, Inc.)
EPA RAC Contract Number EP-S9-08-04

Toeroek Herndon Joint Venture
EPA Contract Number EP-R9-12-02

ITSI, Inc.
EPA RAC Contract Number EP-S9-08-03

Techlaw
EPA ROC Contract Number EP-W-07-066

Techlaw
EPA Contract Number GS-10F-0168J

Oneida Total Integrated Enterprises (OTIE)
EPA Site Specific RAC Contract Number EP-S9-13-01

CH2M Hill, Inc. (subcontractor under OTIE)
EPA Site Specific RAC Contract Number EP-S9-13-01

Any subsequent additions or changes in EPA contractors who may have access to your response to this Information Request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; or to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives along with the response itself, within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If you have objections to some or all of the questions contained in the Information Request letter, you are still required to respond to each of the questions.

ATTACHMENT A

Definitions:

1. The term **"you"** or **"Respondent"** should be interpreted to include the addressee of this Information Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns and agents.

2. The term **"person"** shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.

3. The term **"waste"** or **"wastes"** shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.

4. The term **"hazardous waste"** shall have the same definition as that contained in Section 1004(5) of RCRA.

5. The term **"hazardous substance"** shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.

6. The term **"release"** has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

7. The term **"pollutant or contaminant"** shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.

8. The term **"materials"** shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.

9. The term **"documents"** includes any written, recorded, computer generated or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

10. The term **"metal finishing"** includes plating, anodizing, conversion coating, passivation, chem film, pickling, electroplating; any other processes in which metal is applied to a substrate; or treatment of a metal substrate to enhance the appearance, function or performance of a product.

11. The terms **“chromium-containing”** and **“chromate compound”** include any materials that contain any quantities of chromium. This may include hexavalent chromium, chromic acid, chromate, chromate conversion coatings; brand names including but not limited to Iridite, Alodine, and Chem. Film; and any other material known or suspected to contain any quantity of chromium.

12. The terms **“Volatile Organic Compound,” “VOC,” and “VOC-containing compound”** include any materials that contain any quantities of VOCs. Substances of interest specifically include but are not limited to tetrachloroethylene (“PCE”), trichloroethylene (“TCE”), 1,1,1-trichloroethane (“1,1,1-TCA”), 1,1,2-trichloroethane (“1,1,2-TCA”); and any other material known or suspected to contain any quantity of VOCs.

ATTACHMENT B: INFORMATION REQUEST

1. EPA has obtained information indicating that Senior plc purchased the assets of SSP Industries (corporate successor by merger to SSP Industries f/k/a Stainless Steel Products Incorporated) located at 2980 N. San Fernando Rd., Burbank, CA in 1995 and has continued similar operations under the Senior Aerospace SSP division of Senior Operations LLC. State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Senior plc, Senior Operations LLC, and/or Senior Aerospace SSP (collectively referred to as the "Company").

2. Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 2980 N. San Fernando Rd., Burbank, CA (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 2980 N. San Fernando Rd., Burbank, CA and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.

3. Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved).

4. Provide the date the Company was incorporated, formed, or organized. Identify the state in which the Company was incorporated, formed, or organized.

5. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated since its inception.

6. For each business structure under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure, the name(s) it used, and the Facility addresses at which it operated or was otherwise located.

7. Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.

8. If the Company is or was operating under a fictitious business name, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.

9. What is the relationship, currently and historically, between SSP Industries, Stainless Steel Products Incorporated, and the Company?

10. Who owned the Facility property while SSP Industries and/or Stainless Steel Products Incorporated operated at the Facility?

11. Identify and explain any and all sales of the Company's assets if the sale represented a sale of substantially all of the Company's assets.

12. Identify and explain any investments by the Company in other businesses, companies, or corporations equating to 5% or more of that other business, company, or corporation from the formation of the Company to the present.

13. List the names, titles, telephone number(s), and current or last known addresses of all individuals who are currently or were officers and/or owners of the Company during any time that the Company was operating at the Facility, regardless of the business structure under which the Company is or was operated. Provide documentation of both the percentage of each individual's current or former ownership interest in the Company and the time period(s) during which he/she held this ownership interest.

14. List the names, titles, telephone number(s), and current or last known addresses of all other individuals who worked at the Facility from 1952 to 1995.

15. Identify the dates the Company, under any of its current or former business structures, owned the Facility. Provide a copy of the title documentation evidencing the Company's ownership of the Facility.

16. For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.

17. Provide the dates that the Company, under any of its current or former business structures, operated at the Facility.

18. For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.

19. Identify any individual or entity that owned or operated the Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:

    a. The dates of ownership/operation;
    b. The nature of prior or subsequent operations at the Facility;
    c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and

d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.

20. Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:

    a. The employee's full name;
    b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
    c. The dates that the employee worked at the Facility;
    d. The position(s) the employee held under any of the Company's business structures; and
    e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

21. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.

22. If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Include documentation evidencing the Company's use of chromium or chromium-related substances.

23. Provide a scaled map of the Facility that includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

    a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);
    b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
    c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
    d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);

e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.

24. Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies for the Facility.

25. Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.

26. Identify and provide the information below for all substances containing chromium, including but not limited to chromate compounds, which are or were used at, or transported to, the Facility:

a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.

27. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.

28. Identify, and provide the following information for, all groundwater wells that are located at the Facility:

a. A map with the specific locations of the Facility groundwater wells;
b. Date the Facility groundwater wells were last sampled;
c. List of all constituents that were analyzed during groundwater sampling events; and
d. All groundwater sampling results, reports of findings, and analytical data.

29. Identify, and provide all groundwater data upgradient, downgradient, and on the Facility that you possess or have access to, including, but not limited to:

a. A map with the specific locations of the groundwater wells;
b. Date the groundwater wells were last sampled;
c. List of all constituents that were analyzed during groundwater sampling events; and
d. All groundwater sampling results, reports of findings, and analytical data

30. Identify all insurance policies held by the Company from the time it commenced ownership of or operations at the Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and "first party" property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.

31. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.

32. If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.

33. For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

34. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.

35. Please describe the method used by the Company to remove waste streams from sumps at the Facility.

36. Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.

37. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:

    a. The date each release occurred;
    b. The cause of each release;
    c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
    d. Where each release occurred and what areas were impacted by the release; and
    e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

38. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility,

including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

39. Provide all information that the Company may possess or have access to that indicates that chromium and hexavalent chromium-containing substances used at the facility have not reached groundwater.

ATTACHMENT C: INFORMATION REQUEST FOR METAL FINISHERS

1. Identify those individuals who provided the knowledge, information and documents used to prepare the response to these questions. Include the full name, current title and duties, as well as past titles and duties, current address and telephone number, and tenure for each individual providing an answer for any of these questions.

2. Please describe, in detail and in narrative fashion, the plating and other metal finishing operations (as defined in Attachment A), and metal finishing equipment at the Facility, and changes to the metal finishing operations and associated equipment, since the beginning of the Company's operations at the Facility. Your response to this question must include the following for all of the metal finishing equipment used over time at the Facility:

    a. Provide the dates that the metal finishing operations took place at the Facility;
    b. Provide the dates that the metal finishing equipment was used at the Facility;
    c. State the year(s) that the metal finishing equipment was installed, and identify the specific equipment used in metal finishing operations;
    d. Identify the type of metal finishing performed at the Facility and state whether the metal finishing equipment utilized open or closed dipping tanks and secondary containment structures;
    e. Identify the substances that were used in the metal finishing operations and associated equipment, including but not limited to corrosion inhibitors, and provide Material Safety Data Sheets ("MSDSs") for all such substances;
    f. State whether or not substances containing chromium, including but not limited to chromate compounds, were ever used in the Company's metal finishing operations and metal finishing equipment;
    g. Describe how the substances identified in 2.e. and 2.f., above, were used in the metal finishing operations and metal finishing equipment, and identify the locations where such substances were stored at the Facility;
    h. State the quantities and years that the substances identified in 2.e. and 2.f., above, were stored and used at the Facility;
    i. If the Company was required to report the type and quantity of substances identified in 2.e. and 2.f., above, to any federal or state agency or entity, provide copies of all such reports;
    j. Provide all maps, drawings, diagrams, plans, blueprints, photographs and flow charts related to past and current metal finishing operations, metal finishing equipment and associated piping showing the location of all metal finishing equipment, clarifiers, dry wells, sumps, underground structures, piping and other equipment that were ever connected to the metal finishing equipment;
    k. Describe the waste streams generated by metal finishing operations and metal finishing equipment;
    l. State the volume and frequency of the metal finishing waste materials discharged from the metal finishing operations, and describe the waste storage methods for the waste materials;
    m. Describe how and where waste materials were released from the metal finishing system;

n. Provide copies of all analyses for substances containing chromium, including but not limited to chromate compounds, performed on the materials used in the metal finishing equipment during metal finishing operations, and discharged from the metal finishing equipment prior to disposal; and
o. Provide copies of all analyses for substances containing chromium, including but not limited to chromate compounds in water, sludge or other substances generated during metal finishing operations.

3. If any substance containing chromium as a component, including but not limited to chromate compounds, was utilized in any operations at the Facility since the beginning of the Company's operations at the Facility, provide a complete description of those operations *if not already described in your response to Question 2 above*. Indicate the approximate volume of chromium or chromate compounds used per month at the Facility, the period of time during which chromium or chromate compounds were used, and describe the storage and disposal practices in effect for materials containing chromium or chromate compounds.

4. Please state the source of metal finishing materials used in the Company's metal finishing operations and metal finishing equipment since the beginning of the Company's operations at the Facility.

5. Please describe where the Company disposed of materials used in the Facility's metal finishing operations and metal finishing equipment since the beginning of the Company's operations at the Facility.

6. State whether there have been any releases, or suspected releases, of substances containing chromium, including but not limited to chromate compounds, to the environment at and from the Facility and provide any document describing, evidencing or otherwise documenting such releases.

7. State the number of tanks, including but not limited to "dipping tanks," sumps and clarifiers ever constructed at the Facility or connected to the Facility at any time.

8. Describe how the Company used the tanks identified in Question 7, above.

9. Provide copies of all analyses performed on the soil and groundwater at the Facility, including but not limited to analyses performed on the soil and groundwater beneath and surrounding the tanks identified in Question 7, above. Provide copies of all investigation reports related to those analyses.

10. Were substances containing chromium, including but not limited to chromate compounds, ever pumped, drained, discharged, injected and/or released to the tanks identified in Question 7, above?

11. Provide all documentation, drawings, diagrams, plans, blueprints, photographs, and flow charts that discuss or depict channels, pits, underground storage tanks, aboveground storage

tanks, ponds, drywells, sumps, clarifiers and any other aboveground or underground structures used for storage or disposal since the beginning of the Company's operations at the Facility.

12. Describe how the Company used the channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers and any other aboveground or underground structures, including but not limited to the concrete tanks and clarifier identified in the documents attached to this letter in Attachment F, used for storage or disposal identified in Question 11, above.

13. Were substances containing chromium, including but not limited to chromate compounds, ever pumped, drained, discharged, injected and/or released to the channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers and any other aboveground or underground structures, including but not limited to the concrete tanks and clarifier identified in the documents attached to this letter in Attachment F, used for storage or disposal identified in Question 11, above?

14. Identify and provide copies of any documentation of any hazardous waste-related tax paid by the Company related to any facility from which waste was sent to an off-site disposal facility, and identify the dates upon which you paid such taxes, including but not limited to a description of whether such tax(es) were local, state or federal and the specific regulations under which you were required to pay the tax(es).

15. List and provide copies of all federal, state, county, city and all other local permits, licenses, and/or registrations and their respective permit numbers issued concerning the Facility and the storage, use, and discharge of substances containing chromium, including but not limited to chromate compounds, including but not limited to permits and correspondence related to Publicly Owned Treatment Works ("POTW"), Los Angeles County permits and licenses, and California Air Quality Management District permits and licenses. Your response must include all compliance testing results for all waste streams exiting the Facility.

16. State whether the Company has or had a permit or permits issued under the Resource Conservation and Recovery Act ("RCRA") for the Facility or Facilities. If the answer is "yes," identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.

17. Provide the names, addresses and telephone numbers of any individuals, including former and current employees, who may be knowledgeable of the Company's operations with respect to substances containing chromium, including but not limited to chromate compounds and other hazardous substance, waste or pollutant or contaminant handling, storage and disposal practices at the Facility.

18. Provide the names, addresses and telephone numbers of all individuals, including former and current employees, who may be knowledgeable of the metal finishing operations and metal finishing equipment used at the Facility and all changes to the metal finishing

operations. Your response must include personnel that regularly maintained and repaired metal finishing equipment at the Facility since the beginning of the Company's operations at the Facility.

19. Provide the names of and contact information, including addresses and telephone numbers, for companies and/or individuals that owned the property at the time that the metal finishing operations and metal finishing equipment were used at the Facility.

20. For each prior or subsequent owner or operator identified in your response to Question 19, further identify all evidence that a hazardous substance, pollutant, or contaminant containing chromium was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.

ATTACHMENT D: INFORMATION REQUEST FOR FACILITIES THAT HAVE UTILIZED COOLING SYSTEMS

1. Identify those individuals who provided the knowledge, information and documents used to prepare the response to these questions. Include the full name, current title and duties, as well as past titles and duties, current address and telephone number, and tenure for each individual providing an answer for any of these questions.

2. Please describe, in detail and in narrative fashion, the cooling systems and cooling towers used at the Facility, and changes to the cooling systems and cooling towers, since the beginning of the Company's operations at the Facility. Your response to this question must include the following for all of the cooling systems used over time at the Facility:

   a. Provide the dates that the cooling systems were in operation at the Facility;
   b. Provide the dates that the cooling towers were in operation at the Facility;
   c. State the year(s) that the cooling towers were constructed, and identify the materials of which the towers were constructed (e.g. metal, wood, etc.);
   d. Identify the type of cooling system and state whether the cooling systems were "open recirculating cooling systems" or "closed recirculating cooling systems";
   e. Identify the substances that were used in the cooling systems and cooling towers, and in the water circulated within the cooling systems and cooling towers, including but not limited to corrosion inhibitors, and provide Material Safety Data Sheets ("MSDSs") for all such substances;
   f. State whether or not substances containing chromium, including but not limited to potassium dichromate, were ever used in the Company's cooling systems and cooling towers;
   g. Describe how the substances identified in 2.e. and 2.f., above, were used in the cooling systems and cooling towers, and identify the locations where such substances were stored at the Facility;
   h. State the quantities and years that the substances identified in 2.e. and 2.f., above, were stored and used at the Facility;
   i. If the Company was required to report the type and quantity of substances identified in 2.e. and 2.f., above, to any federal or state agency or entity, provide copies of all such reports;
   j. Provide all maps, drawings, diagrams, plans, blueprints, photographs and flow charts related to past and current cooling systems, cooling towers and associated piping showing the location of all cooling towers, percolation pits, dry wells, sumps, underground structures, piping and other wells that were ever connected to the cooling system including but not limited to cooling water blowdown from cooling towers;
   k. Describe the waste streams generated by operation of the cooling systems and cooling towers;
   l. State the volume and frequency of the cooling water blowdown discharged from the cooling system, and describe the waste storage methods for the blowdown;
   m. Describe how and where cooling tower purge steam was released from the cooling system;

n. Provide copies of all analyses for chromium performed on the water prior to use in the cooling systems and cooling towers, during use in the cooling systems and cooling towers, and discharged from the cooling system and cooling towers; and
o. Provide copies of all analyses for chromium in air emitted from the cooling systems and cooling towers.

3. If any substance containing chromium as a component ("chromium-related substances") was utilized in any operations at the Facility since the beginning of the Company's operations at the Facility, provide a complete description of those operations if not already described in your response to Question 2 above. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the period of time during which chromium or chromium-related substances were used, and describe the storage and disposal practices in effect for materials containing chromium.

4. Please state the source of water used in the Company's cooling systems and cooling towers since the beginning of the Company's operations at the Facility.

5. Please describe where the Company disposed of water used in the Facility's cooling systems and cooling towers since the beginning of the Company's operations at the Facility.

6. State whether there have been any releases, or suspected releases, of substances containing chromium, including but not limited to potassium dichromate, to the environment at and from the Facility and provide any document describing, evidencing or otherwise documenting such releases.

7. State the number of pits, including but not limited to "condensation pits," "perc pits," "percolation pits," "discharge pits," "dry wells," and "septic pits" ever constructed at the Facility or connected to the Facility at any time.

8. Describe how the Company used the pits identified in Question 7, above.

9. Provide copies of all analyses performed on the soil and groundwater at the Facility, including but not limited to analyses performed on the soil and water beneath and surrounding the pits identified in Question 7, above. Provide copies of all investigation reports related to those analyses.

10. Were substances containing chromium ever pumped, drained, discharged, injected and/or released to the pits identified in Question 7, above?

11. Provide all documentation, drawings, diagrams, plans, blueprints, photographs, and flow charts that discuss or depict channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps and any other aboveground or underground structures used for storage or disposal since the beginning of the Company's operations at the Facility.

12. Identify and provide copies of any documentation of any hazardous waste-related tax paid by the Company related to any facility from which waste was sent to an off-site disposal facility, and identify the dates upon which you paid such taxes, including but not limited to a description of whether such tax(es) were local, state or federal and the specific regulations under which you were required to pay the tax(es).

13. List and provide copies of all federal, state, county, city and all other local permits, licenses, and/or registrations and their respective permit numbers issued concerning the Facility and the storage, use, and discharge of substances containing chromium, including but not limited to permits and correspondence related to Publicly Owned Treatment Works ("POTW"), Los Angeles County permits and licenses, and California Air Quality Management District permits and licenses. Your response must include all compliance testing results for all waste streams exiting the Facility.

14. State whether the Company has or had a permit or permits issued under the Resource Conservation and Recovery Act ("RCRA") for the Facility or Facilities. If the answer is "yes," identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.

15. Provide the names, addresses and telephone numbers of any individuals, including former and current employees, who may be knowledgeable of the Company's operations with respect to chromium, potassium dichromate, and other hazardous substance, waste or pollutant or contaminant handling, storage and disposal practices at the Facility.

16. Provide the names, addresses and telephone numbers of all individuals, including former and current employees, who may be knowledgeable of the cooling system(s) and cooling towers used at the Facility and all changes to the cooling system(s). Your response must include personnel that regularly maintained and repaired cooling systems at the Facility since the beginning of the Company's operations at the Facility.

17. Provide the names of and contact information, including addresses and telephone numbers, for companies and/or individuals that owned the property at the time that the cooling systems and cooling towers were used at the Facility.

ATTACHMENT E: INFORMATION REQUEST FOR FACILITIES THAT HANDLED VOLATILE ORGANIC COMPOUNDS ("VOCs")

1. Identify those individuals who provided the knowledge, information and documents used to prepare the response to these questions. Include the full name, current title and duties, as well as past titles and duties, current address and telephone number, and tenure for each individual providing an answer for any of these questions.

2. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1,1-TCA and 1,1,2-TCA) that are or were used at, or transported to, the Facility since the beginning of the Company's operations at the Facility.

    a. The trade or brand name, chemical composition, and quantity used for each VOC-containing substance and the Material Safety Data Sheet for each product;
    b. The location(s) where each VOC-containing substance is or was used, stored, and disposed of, and the dates of chemical or hazardous substance use, storage or disposal at each location;
    c. Identify the specific equipment used in operations during which VOCs were utilized, and state the year(s) that the equipment was installed;
    d. State whether the storage areas and equipment in which VOC-containing substances were stored or used utilized secondary containment structures;
    e. Describe the waste streams generated by operations and equipment with respect to VOCs and VOC-containing substances;
    f. State the volume and frequency of the VOC-containing waste materials discharged from the operations, and describe the waste storage methods for the waste materials;
    g. Provide copies of all analyses for substances containing VOCs performed on the materials used in equipment, during operations, and discharged from equipment prior to disposal;
    h. Provide copies of all analyses for substances containing VOCs in water, sludge or other substances generated during operations;
    i. State the quantity of VOC-containing substance(s) purchased (in gallons), the time period during which it was used, and the identity of all persons who used it;
    j. Identify the supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances;
    k. If the Company was required to report the type and quantity of substances identified in 2.e. and 2.f., above, to any federal or state agency or entity, provide copies of all such reports; and
    l. Provide all maps, drawings, diagrams, plans, blueprints, photographs and flow charts related to past and current operations, equipment and associated piping showing the location of all equipment, clarifiers, dry wells, sumps, underground structures, piping and other equipment that were ever connected to the equipment, with respect to VOCs and VOC-containing substances.

3. If any substance containing VOCs as a component was utilized in any operations at the Facility since the beginning of the Company's operations at the Facility, provide a

complete description of those operations if not already described in your response to Question 2 above. Indicate the approximate volume of VOCs or VOC-containing substances used per month at the Facility, the period of time during which VOCs or VOC-containing substances were used, and describe the storage and disposal practices in effect for materials containing VOCs.

4. Please state the source of VOC-containing materials used in the Company's operations and equipment since the beginning of the Company's operations at the Facility.

5. Please describe where the Company disposed of VOC-containing materials used in the Facility's operations and equipment since the beginning of the Company's operations at the Facility.

6. State whether there have been any releases, or suspected releases, of substances containing VOCs to the environment at and from the Facility and provide any document describing, evidencing or otherwise documenting such releases.

7. State the number of tanks, including but not limited to degreasers, sumps and clarifiers ever constructed at the Facility or connected to the Facility at any time.

8. Describe how the Company used the tanks identified in Question 7, above.

9. Provide copies of all analyses performed on the soil and groundwater at the Facility, including but not limited to analyses performed on the soil and groundwater beneath and surrounding the tanks identified in Question 7, above. Provide copies of all investigation reports related to those analyses.

10. Were substances containing VOCs ever pumped, drained, discharged, injected and/or released to the tanks identified in Question 7, above?

11. Provide all documentation, drawings, diagrams, plans, blueprints, photographs, and flow charts that discuss or depict channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers and any other aboveground or underground structures used for storage or disposal since the beginning of the Company's operations at the Facility.

12. Describe how the Company used the channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers and any other aboveground or underground structures, including but not limited to the concrete tanks and clarifier identified in the documents attached to this letter in Attachment F, used for storage or disposal identified in Question 11, above.

13. Were substances containing VOCs ever pumped, drained, discharged, injected and/or released to the channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers and any other aboveground or underground structures, including but not limited to the concrete tanks and clarifier identified in the documents

attached to this letter in Attachment F, used for storage or disposal identified in Question 11, above?

14. Identify and provide copies of any documentation of any hazardous waste-related tax paid by the Company related to any facility from which waste was sent to an off-site disposal facility, and identify the dates upon which you paid such taxes, including but not limited to a description of whether such tax(es) were local, state or federal and the specific regulations under which you were required to pay the tax(es).

15. List and provide copies of all federal, state, county, city and all other local permits, licenses, and/or registrations and their respective permit numbers issued concerning the Facility and the storage, use, and discharge of substances containing VOCs, including but not limited to permits and correspondence related to Publicly Owned Treatment Works ("POTW"), Los Angeles County permits and licenses, and California Air Quality Management District permits and licenses. Your response must include all compliance testing results for all waste streams exiting the Facility.

16. State whether the Company has or had a permit or permits issued under the Resource Conservation and Recovery Act ("RCRA") for the Facility or Facilities. If the answer is "yes," identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.

17. Provide the names, addresses and telephone numbers of any individuals, including former and current employees, who may be knowledgeable of the Company's operations with respect to substances containing VOCs, waste or pollutant or contaminant handling, storage and disposal practices at the Facility.

18. Provide the names, addresses and telephone numbers of all individuals, including former and current employees, who may be knowledgeable of the operations and equipment at the Facility that utilized VOCs. Your response must include personnel that regularly maintained and repaired equipment at the Facility since the beginning of the Company's operations at the Facility.

19. Provide the names of and contact information, including addresses and telephone numbers, for companies and/or individuals that owned or operated the property at the time that substances containing VOCs were used at the Facility.

20. For each prior or subsequent owner or operator identified in your response to Question 19, further identify all evidence that a hazardous substance, pollutant, or contaminant containing VOCs was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.

STAINLESS STEEL PRODUCTS
INCORPORATED

2980 North San Fernando Blvd. • Burbank, California 91504 • (818) 841-9190

~ in 1995, Became Senior Aerospace SSP.

November 16, 1987

Ms. Patti Cleary
U.S. Environmental Protection Agency
Region IX (T-4-1)
215 Fremont Street
San Francisco, California 94105

Subject: San Fernando Valley Superfund Site

Reference: T-4-1

Dear Ms. Cleary:

By a letter dated August 19, 1987, Mr. Jeff Zelikson, Acting Director, Toxics & Waste Management Division, Region IX, requested that Stainless Steel Products, Inc. (hereinafter referred to as "SSP") submit certain information within thirty (30) calendar days of receipt of the letter. Thereafter, extensions until November 16, 1987 were granted to SSP. This letter is in response to Mr. Zelikson's request.

In preparing this response, we have conducted a review of available records and interviews with those present employees who we believe may have information relevant to the questions in the letter. However, in light of the length of time the facility has been in operation and the complexity of the inquiry, we do not have all records or information which would cover the entire period that SSP has been in operation at this location. To the extent that records have been located or information is available they form the basis for the answers set forth below.

Question:

1. A detailed description of all hazardous substances and hazardous wastes that were or are used in operation or production-related processes at your facility located at 2980 N. San Fernando Blvd., Burbank, CA and the dates of use or generation at this facility. For each substance and each waste, provide the following information:

   (a) the common chemical name, specific chemical name, and chemical composition by volume for liquids and weight for solids;

Answer:

The various hazardous chemical substances used at SSP are listed in Exhibit A. These substances have been used since production began at the SSP facility in approximately 1952 except as noted below.

Prior to 1967, trichloroethylene was used to degrease parts. In 1967 use of trichloroethylene was discontinued and perchloroethylene was substituted for degreasing of parts.

Prior to 1969, kolene and other hot sodium hydroxide salt baths were used in chemical processing of parts.

Between approximately 1977 and 1979 alodine, a coating material, was applied in dip tanks.

In addition, various resins, adhesives, solvent, which were used in the past in very small amounts are noted in Exhibit A as "discontinued".

The chemical compositions of trade name substances used in recent years (e.g., TURCO HTC) are further defined in the Material Safety Data Sheets contained in Exhibit B.

Question:

(b) the total amount, in gallons for liquids and in tons for solids;

Answer:

The estimated average amounts of hazardous substances used on an annual basis are set forth in Exhibit A. The amounts may have varied over the years depending upon production levels or methods but not by more than approximately 20%.

Exhibit C sets forth amounts of hazardous waste compiled from available records.

Question:

(c) the methods and processes used to generate, store, treat, dispose of, and otherwise handle each substance;

(d) When and where the above processes occurred and are occurring, please specify dates and locations as precisely as possible. Location information should include, but not be limited to information pertaining to ponds, tanks, treatment facilities, and other units which were historically used to treat, store, and/or dispose of hazardous substances but which may no longer exist.

Answer:

SSP is a metal fabricator. It purchases various metal alloys such as aluminum, titanium, inconel and stainless steel and fabricates metal parts and assemblies by shearing, forming, grinding, machining, welding and heat treating the metal alloys. During the fabrication process, metal parts are routinely chemically processed to clean, etch, pickle or brighten the metal. Some parts may also be subjected to liquid dye penetrant inspection procedures. Some small amount of painting is done incidental to finishing insulation covers and part marking. Very little waste is generated with this painting process.

Chemical substances used in production are generally stored in the commercial container in which the substance was delivered to SSP (usually standard 55-gallon metal drums, 95# baumaides or 20-gallon plastic bottles). These containers are stored in the areas designated "flammable storage" and "acid storage" on Exhibit I. The following are exceptions to this practice:

Sodium dichromate is commercially available in powder form and is routinely received and stored indoors in commercial grade plastic and paper bags in a shed next to the maintenance building.

Perchloroethylene is purchased and received in bulk liquid form. It is delivered by truck and stored in a 500-gallon storage tank which is elevated above ground.

Ammonia is purchased and received in bulk form. It is delivered by truck and stored in a 500-gallon steel pressure tank above ground.

Various chemical substances, such as paint, paint thinner, rust inhibitor oils, dye penetrant inspection oils, etc. are routinely purchased, handled and stored in small commercial containers ranging from approximately one pint or less to five gallons. These are normally stored in flame-proof cabinets.

Answer: (Continued)

When chemical substances are spent and must be disposed, they are treated and handled as described below:

Acids are pumped from the process tank into an above-ground, contained plastic holding tank where they are pH-neutralized. Prior to 1987, these materials were neutralized in a 1,000-gallon concrete tank further described in the answer to question 4 and Exhibit O.

A licensed hauler removes the neutralized acid in bulk and disposes of the neutralized acid in a licensed disposal area. Please refer to Exhibits C and D.

Alkaline liquids are pumped from the process tank into the above-ground, contained plastic holding tank described above. A licensed hauler removes the alkaline waste in bulk and disposes of it in a licensed disposal area. Please refer to Exhibits C and D. Prior to 1987 these materials were held in the same 1,000 gallon concrete tank in which acids were neutralized.

Used materials such as hydraulic oils, greases, machine coolant oils, heat treat quench oils, solvents, etc. are placed in containers (typically standard 55-gallon steel drums) which are stored in the area shown (Zone D7) on Exhibit I. A licensed hauler pumps the material from the containers into a tank truck, and hauls it to a licensed facility for recycling or incineration. Please see Exhibits C and D.

Prior to 1974 these materials were held in an approximately 800-gallon steel tank further described in the answer to question 4 and were periodically pumped out for offsite disposal.

Today, used materials generated in small quantities, i.e., paints, adhesives, resins and epoxy coatings are placed in "lab-pack" containers (typically standard 55-gallon steel drums also containing absorbant materials). These containers are stored in the area shown (Zone D7) on Exhibit I and then disposed in a licensed disposal facility. Please refer to Exhibit C.

Generally, spent trichloroethylene and, subsequently, spent perchloroethylene were shipped off-site for reuse/recycle or disposal. For a limited time period at the end of 1963 and the beginning of 1964, small amounts of trichloroethylene and solvent were spread on the ground for evaporation. The areas are along the west side of Building 400 and around the northwest corner of Building 100. Since 1964, these areas have been covered by blacktop or concrete. Also very small amounts of solvent were spread to the east of the property now occupied by the Golden State Freeway.

Question:

2. Any photographs, maps, or diagrams, regardless of their date, which show areas where hazardous substances have been or may be located.

Answer:

Please note that the drawings and diagrams referenced below are general in nature and were not necessarily intended to be exact representations of the locations of buildings, structures or equipment.

Enclosed are four (4) plan view drawings of SSP's physical plant layout showing various buildings and accoutrements.

Exhibit F is a drawing of the SSP factory layout in 1962.

Exhibit G is a drawing of the SSP expanded property layout in 1964.

Exhibit H is a drawing of the SSP property layout in 1972.

Exhibit I is a drawing of the SSP current factory layout.

Also enclosed are building permits with sketches showing various additions to the SSP plant at various times.

Exhibit J is a drawing of the location of a "pickling and neutralizing" slab in 1952.

Exhibit K is a drawing of the main factory buildings and processing slab in 1955.

Exhibit L is a drawing of the main factory building expansion in 1959.

Exhibit M is a drawing of further expansion of the SSP main factory in 1964.

Exhibit N is a drawing of the permit to install a clarifier to process and control sewer discharge in 1967.

Exhibit O contains documents relating to two (2) underground steel tanks which stored gasoline and one (1) underground concrete tank which stored spent processing tank wastes which were removed in 1986.

Question:

3. A description of past and present disposal and transport practices of hazardous substances and hazardous wastes generated or used at your facility. Specifically, please provide a detailed description, including copies of manifests of hazardous substances and hazardous wastes transported or disposed of at disposal sites used by your company. Also provide the name and address of all transporter(s) used by your company to transport hazardous substances or hazardous wastes.

Answer:

Information regarding past disposal and transportation practices from available records is summarized in Exhibit C. Individual manifests are contained in Exhibit D. The available names, addresses and telephone numbers of transporters and disposal facilities are contained in Exhibit P.

See the answer to 2(c) above for additional information on current transportation and disposal procedures.

Question:

4. Locations and detailed descriptions of all monitoring wells, supply wells, injection wells, and underground tanks at your facility.

Answer:

SSP does not have, nor has it ever had, any monitoring wells, supply wells or injection wells.

SSP has had or presently has the following underground storage tanks.

A 1,000-gallon steel tank used to store gasoline was located behind the northeast corner of the main factory building. The location of this tank is shown on Exhibits F and H. The date of installation of this tank is unknown but was prior to 1962. This tank was removed in 1986. Documents relating to the removal are contained in Exhibit O.

A 2,000-gallon steel tank used to store gasoline was located west of the main factory building behind the northeast corner of the adjacent building. The location of this tank is shown on Exhibits G and H. The date of installation of this tank is unknown but was prior to 1964. This tank was removed in 1986. Documents relating to the removal are contained in Exhibit O.

Answer: (Continued)

A 1,000-gallon concrete tank used to store ammonium nitrate was located west of the main factory building. The location of this tank is shown on Exhibit O. The date of installation of this tank is unknown. This tank was removed in 1986. Documents relating to the removal are contained in Exhibit O.

An approximately 800-gallon inactive steel tank used to store used material is located behind the northeast corner of the main factory building. The location of this tank is shown on Exhibit H. The date of installation of this tank is unknown but was prior to 1959. In 1974 all liquid was pumped out of the tank for off-site disposal and no additional liquids have been added since 1974. We have no records or information regarding the location of the off-site disposal site. Removal of this tank is scheduled for 1987.

Two (2) concrete tanks used to store cooling water as part of a closed loop cooling system for factory equipment are presently in use. An algaecide, sulfamic acid, is used in these tanks, however, no other substances are in use in these tanks and the tanks produce no hazardous wastes. The location of these tanks is shown in Exhibit I.

A concrete clarifier tank is used to settle out incidental solids (airborne dust, shop soil, etc.) and balance the pH of waste water which is directed to the city sewer. This clarifier tank was installed in 1967 and produces no hazardous waste. The location of this clarifier tank is shown on Exhibit I. Further information regarding this clarifier tank is set forth in the answer to question 5 below.

Question:

5. All analyses from sampling of monitoring and supply wells and underground tanks at your facility.

Answer:

The water from the clarifier tank after having been pH adjusted is sampled on a quarterly basis by an outside laboratory. We have records of the results of such sampling dating back to 1981. These records are contained in Exhibit Q.

The pH of the clarifier tank is also monitored continuously and pH is automatically adjusted. The monitoring system is checked daily and the results recorded in a record log. We have copies of this log back to 1985. These records are contained in Exhibit R.

Question:

6. A list of all current and former employees, agents, contractors, consultants, company officers and other personnel who may possess knowledge or information relevant to this inquiry. This list should include each individual's name, address, telephone number and job title or function.

Answer:

Current employees who may possess information relevant to this inquiry are listed in Exhibit S.

Contractors who may possess information relevant to this inquiry are listed in Exhibit T. Also, please see Exhibit P.

Question:

7. Length of time your company has been at the site location and any information you have regarding former occupants of this location and their hazardous waste practices.

Answer:

SSP or its predecessors in interest have occupied the main factory site since 1951. The property was undeveloped at the time acquired by SSP's predecessor in interest. We believe its prior use was agricultural (vineyards). The adjacent property shown on Exhibit C as "National Frost Protection Co., Inc." was purchased in 1960. Prior use of that property is unknown.

Question:

8. A descriptive list of all insurance policies held by your company. The description should include the dates during which each policy was in force, the general type of policy, e.g., comprehensive, general liability, automobile and the insurance company issuing the policy, policy number, and any specific provision of the policy which may relate to claims for environmental damages.

Answer:

We have no records relating to insurance policies held by SSP's predecessor in interest prior to 1980. Moreover, in light of the complexities and inconsistencies of court decisions regarding insurance coverage with respect to pollution, we believe that it is impossible to determine with any degree of certainty whether past or current policies,

EXH. N

CITY OF BURBANK
PUBLIC WORKS DEPARTMENT

INDUSTRIAL WASTE NO. 051

APPLICATION FOR DISCHARGE

NOTE: A $15.00 FEE MUST ACCOMPANY THIS APPLICATION FOR CONSIDERATION BY THE PUBLIC WORKS DIRECTOR.

FIRM NAME STAINLESS STEEL PRODUCTS, INC. PHONE 849-3283

ADDRESS 2980 NO. SAN FERNANDO BLVD., BURBANK, CALIF.

TYPE OF BUSINESS STAINLESS STEEL DUCTING AND BELLOWS

PROCESS DISCHARGING WASTES	MAX GPM	AVE GPD
RINSE WATER	15	12,780

CHEMICAL AND PHYSICAL CHARACTERISTICS OF WASTE

PRIOR TO TREATMENT: PH 2.6; CHLORIDE PLUS SULFATE, PPM 78; TOTAL DISSOLVED SOLIDS, PPM 650; TOTAL HARDNESS, PPM 210; TOTAL NITROGEN, PPM 246; HEXAVALENT CHROMIUM, PPM 0.00; CYANIDE, PPM 0.00

PLANS OF WASTE DISPOSAL FACILITIES ON THE PREMISES REFERRED TO HEREIN MUST ACCOMPANY THIS APPLICATION.

NAME OF APPLICANT OR REPRESENTATIVE OF FIRM FX-6 Personal Privacy TITLE CHIEF INDUSTRIAL ENGINEER

SIGNATURE FX-6 Personal Privacy DATE DECEMBER 7, 1956

DO NOT WRITE BELOW THIS LINE

DISCHARGE WILL BE TO: (✓) SEWER ( ) STORM DRAIN ( ) OTHER

REQUIREMENTS 1250 GAL. 3 COMP CLARIFIER AS PER DETAIL NO 60 REQ'D.
PH RECORD CHARTS TO BE SUBMITTED FOR INSPECTION ON REQUEST.
NO DISCHARGE OF OIL, SOLVENT OR HARMFULL CHEMICALS TO SEWER.
pH, BETWEEN - 5.5-9.5
SUSPENDED SOLIDS - 1000 mg/l max.
OIL & GREASE - 600 mg/l max.

ADDITIONAL INFORMATION:

APPPOVED BY FX-6 Personal Privacy DATE 1-4-66

Class III

ML 851

SHOULD BE 1-4-67

May 27,2014

Dear Customer:

The following is the proof-of-delivery for tracking number **594832997469**.

Delivery Information:

Status:		**Delivered to:**	Shipping/Receiving
Signed for by:	FX-6 Personal Privacy	**Delivery location:**	2980 N SAN FERNANDO BLVD BURBANK, CA 91504
Service type:	FedEx Priority Overnight	**Delivery date:**	May 7, 2014 09:02
Special Handling:	Deliver Weekday Direct Signature Required		

FX-6 Personal Privacy

Shipping Information:

Tracking number:	594832997469	**Ship date:**	May 6, 2014
		Weight:	0.5 lbs/0.2 kg

Recipient:
Steven Loye
Senior Operations LLC
2980 N. San Fernando Blvd.
BURBANK, CA 91504 US

Shipper:
GCOU
Toeroek Associates, Inc.
1300 Clay Street
Suite 450
Oakland, CA 94612 US

Reference
9037-006

Thank you for choosing FedEx.

May 27,2014

Dear Customer:

The following is the proof-of-delivery for tracking number **594832997470**.

Delivery Information:

Status:	Delivered	**Delivered to:**	Receptionist/Front Desk
Signed for by:	FX-6 Personal Privacy	**Delivery location:**	59/61 HIGH STREET RICKMANSWORTH HERTFORDSHIRE WD31RH
Service type:	FedEx International Priority	**Delivery date:**	May 8, 2014 13:04
Special Handling:	Deliver Weekday		

NO SIGNATURE IS AVAILABLE
FedEx Express proof-of-delivery details appear below; however, no signature is currently available for this shipment. Please check again later for a signature.

Shipping Information:

Tracking number:	594832997470	**Ship date:**	May 6, 2014
		Weight:	1.0 lbs/0.5 kg

Recipient:
MARK ROLLINS
SENIOR PLC
59/61 HIGH STREET
RICKMANSWORTH
HERTFORDSHIRE WD31RH GB
Reference

Shipper:
GCOU
TOEROEK ASSOCIATES, INC.
1300 CLAY STREET
SUITE 450
OAKLAND, CA 94612 US
9037-006

Thank you for choosing FedEx.

May 27,2014

Dear Customer:

The following is the proof-of-delivery for tracking number **594832997447**.

Delivery Information:

Status:	Delivered	**Delivered to:**	Receptionist/Front Desk
Signed for by:	FX-6 Personal Privacy	**Delivery location:**	320 W 4TH STREET SUITE 200 LOS ANGELES, CA 90013
Service type:	FedEx Priority Overnight	**Delivery date:**	May 7, 2014 09:45
Special Handling:	Deliver Weekday Direct Signature Required		

FX-6 Personal Privacy

Shipping Information:

Tracking number:	594832997447	**Ship date:**	May 6, 2014
		Weight:	0.5 lbs/0.2 kg

Recipient:
Larry Moore
LA RWQCB
320 West 4th Street
Suite 200
LOS ANGELES, CA 90013 US
Reference

Shipper:
GCOU
Toeroek Associates, Inc.
1300 Clay Street
Suite 450
Oakland, CA 94612 US
9037-006

Thank you for choosing FedEx.

May 27,2014

Dear Customer:

The following is the proof-of-delivery for tracking number **594832997458**.

Delivery Information:

Status:	Delivered	**Delivered to:**	Receptionist/Front Desk
Signed for by:	FX-6 Personal Privacy	**Delivery location:**	9211 OAKDALE AVE CHATSWORTH, CA 91311
Service type:	FedEx Priority Overnight	**Delivery date:**	May 7, 2014 09:11
Special Handling:	Deliver Weekday Direct Signature Required		

FX-6 Personal Privacy

Shipping Information:

Tracking number:	594832997458	**Ship date:**	May 6, 2014
		Weight:	0.5 lbs/0.2 kg

Recipient:
Tedd Yargeau
CA DTSC
9211 Oakdale Avenue
CHATSWORTH, CA 91311 US

Shipper:
GCOU
Toeroek Associates, Inc.
1300 Clay Street
Suite 450
Oakland, CA 94612 US

Reference
9037-006

Thank you for choosing FedEx.